

1 ERIC GRANT  
2 United States Attorney  
3 JAMES R. CONOLLY  
4 Assistant United States Attorney  
5 501 I Street, Suite 10-100  
6 Sacramento, CA 95814  
7 Telephone: (916) 554-2700  
8 Facsimile: (916) 554-2900

9  
10 Attorneys for Plaintiff  
11 United States of America

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 CASE NO. 2:22-CR-147-WBS

17 v. Plaintiff,

SARAH ANDERSON,  
FABIAN GOMEZ,  
WILLIAM OWEN,  
JOALEEN ROGERS,  
Defendants.

18 STIPULATION REGARDING EXCLUDABLE  
19 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
20 ORDER

21 DATE: August 18, 2025  
TIME: 10:00 a.m.  
COURT: Hon. William B. Shubb

22  
23 STIPULATION

24 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
25 through defendant's counsel of record, hereby stipulate as follows:

26 1. This case is set for a status conference on August 18, 2025.

27 2. By this stipulation, defendants<sup>1</sup> now move to continue the status conference until

28 **October 27, 2025 at 10:00 a.m.**, and to exclude time between August 18, 2025, and October 27, 2025,  
under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

29 ////

30 <sup>1</sup> Defendants Wendy Labuda and Epifanio Ramirez do not join in this stipulation. Wendy  
31 Labuda entered a guilty plea on July 21, 2025. ECF No. 181. Epifanio Ramirez has requested, through  
32 counsel, that the Court set a change of plea hearing for him on August 18, 2025.

1       3.     The parties agree and stipulate, and request that the Court find the following:

2           a)     The government has produced discovery in this matter, consisting of over 1,300  
3     pages of investigative reports and photographs, including arrest reports, DEA reports, and other  
4     supporting documents. The government has also made available to the defense for viewing at the  
5     U.S. Attorney's Office, by appointment, hours of video surveillance evidence for multiple  
6     controlled drug buys in the underlying investigation.

7           b)     Defense counsel desire additional time to conduct investigation into the charges,  
8     the alleged roles of their respective clients, and to review discovery in this case, including  
9     watching the video evidence the government has made available. Defense counsel will need  
10    additional time to discuss potential resolutions with their clients, prepare pretrial motions, and  
11    otherwise prepare for trial.

12          c)     Counsel for defendants believe that failure to grant the above-requested  
13    continuance would deny them the reasonable time necessary for effective preparation, taking into  
14    account the exercise of due diligence.

15          d)     The government does not object to the continuance.

16          e)     Based on the above-stated findings, the ends of justice served by continuing the  
17    case as requested outweigh the interest of the public and the defendant in a trial within the  
18    original date prescribed by the Speedy Trial Act.

19          f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
20    et seq., within which trial must commence, the time period of August 18, 2025 to October 27,  
21    2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
22    T4] because it results from a continuance granted by the Court at defendant's request on the basis  
23    of the Court's finding that the ends of justice served by taking such action outweigh the best  
24    interest of the public and the defendant in a speedy trial.

25        ///

26        ///

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1       4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
3 must commence.

4       IT IS SO STIPULATED.

5 Dated: August 12, 2025

ERIC GRANT  
United States Attorney

6       \_\_\_\_\_  
7 /s/ JAMES R. CONOLLY  
JAMES R. CONOLLY  
Assistant United States Attorney

8 Dated: August 12, 2025

9       \_\_\_\_\_  
10 /s/ DANIEL B. OLMOS  
DANIEL B. OLMOS  
Counsel for Defendant  
SARAH ANDERSON

11 Dated: August 12, 2025

12       \_\_\_\_\_  
13 /s/ DAVID D. FISCHER  
DAVID D. FISCHER  
Counsel for Defendant  
FABIAN GOMEZ

14 Dated: August 12, 2025

15       \_\_\_\_\_  
16 /s/ JOHN R. MANNING  
JOHN R. MANNING  
Counsel for Defendant  
WILLIAM OWEN

17 Dated: August 12, 2025

18       \_\_\_\_\_  
19 /s/ TAMARA SOLOMAN  
TAMARA SOLOMAN  
Counsel for Defendant  
JOALEEN ROGERS

20       **ORDER**

21       IT IS SO FOUND AND ORDERED.

22 Dated: August 13, 2025

23         
24 WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE